

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MOBILEMEDIA IDEAS LLC,	)	
	)	
Plaintiff,	)	Civil Action No. 3:11-cv-02353-N
	)	
v.	)	JURY TRIAL DEMANDED
	)	
RESEARCH IN MOTION LIMITED and	)	
RESEARCH IN MOTION	)	
CORPORATION,	)	
	)	
Defendants.	)	

**JOINT MOTION FOR ENTRY OF AMENDED AGREED PROTECTIVE ORDER**

Plaintiff MobileMedia Ideas, LLC (“MobileMedia”) and defendants Research In Motion Limited and Research In Motion Corporation (collectively, “RIM”) respectfully move this Court for entry of the attached proposed Amended Agreed Protective Order, which makes certain amendments to the source code provisions in Paragraph 10. The proposed Order is attached as Exhibit A and a redline showing the differences between the amended and current Order (Dkt. No. 101) is attached as Exhibit B.

**CONCLUSION**

Accordingly, the parties respectively request that the Court enter the attached proposed Amended Agreed Protective Order.

July 31, 2012

Respectfully submitted,

By: /s/ Justin J. Daniels

Michael P. Lynn

State Bar No. 12738500

Email: [mlynn@lynnllp.com](mailto:mlynn@lynnllp.com)

Eric W. Pinker, P.C.

State Bar No. 16016550

Email: [epinker@lynnllp.com](mailto:epinker@lynnllp.com)

Mark E. Turk

State Bar No. 00786298

Email: [mturk@lynnllp.com](mailto:mturk@lynnllp.com)

LYNN TILLOTSON PINKER & COX, LLP

2100 Ross Avenue, Suite 2700

Dallas, TX 75201

Tel: (214) 981-3800

Fax: (214) 981-3839

PROSKAUER ROSE LLP

Steven M. Bauer (*admitted pro hac vice*)

Justin J. Daniels (*admitted pro hac vice*)

Safraz W. Ishmael (*admitted pro hac vice*)

One International Place

Boston, MA 02110-2600

(617) 526-9600

PROSKAUER ROSE LLP

Kenneth Rubenstein (*admitted pro hac vice*)

Anthony Coles (*admitted pro hac vice*)

Alan Federbush (*admitted pro hac vice*)

Eleven Times Square

New York, NY 10036

(212) 969-3000

*Attorneys for Plaintiff*

*MobileMedia Ideas LLC*

By: /s/ S. Calvin Walden

John R. Emerson

[russ.emerson@haynesboone.com](mailto:russ.emerson@haynesboone.com)

HAYNES AND BOONE, LLP

2323 Victory Avenue

Suite 700

Dallas, TX 75219-7673

Telephone: 214.651.5328

Facsimile: 214.200.0884

Mark G. Matuschak

[mark.matuschak@wilmerhale.com](mailto:mark.matuschak@wilmerhale.com)

WILMER CUTLER PICKERING

HALE AND DORR LLP

60 State Street

Boston, Massachusetts 02109

Telephone: (617) 526-6000

Facsimile: (617) 526-5000

S. Calvin Walden

[calvin.walden@wilmerhale.com](mailto:calvin.walden@wilmerhale.com)

WILMER CUTLER PICKERING

HALE AND DORR LLP

399 Park Avenue

New York, NY 10022

Telephone: (212) 230-8800

Facsimile: (212) 230-8888

James M. Dowd

[james.dowd@wilmerhale.com](mailto:james.dowd@wilmerhale.com)

WILMER CUTLER PICKERING

HALE AND DORR LLP

350 South Grand Avenue, Suite 2100

Los Angeles, CA 90071

Telephone: (213) 443-5300

Facsimile: (213) 443-5400

Gregory H. Lantier  
[gregory.lantier@wilmerhale.com](mailto:gregory.lantier@wilmerhale.com)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363

Joe W. Redden, Jr.  
State Bar No. 16660600  
[jredden@brsfirm.com](mailto:jredden@brsfirm.com)  
Michael Richardson  
State Bar No. 24002838  
[mrichardson@brsfirm.com](mailto:mrichardson@brsfirm.com)  
BECK REDDEN & SECREST, LLP  
One Houston Center  
1221 McKinney Street, Suite 4500  
Houston, Texas 77010  
Telephone: (713) 951-3700  
Facsimile: (713) 951-3720

*Attorneys for Defendants  
Research in Motion Limited and  
Research in Motion Corporation*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on July 31, 2012, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule Cv-5(a)(3).

/s/ Mark E. Turk  
Mark E. Turk